



United States Environmental Protection Agency  
Washington, DC 20460

## Work Assignment

Work Assignment Number

**WA-4**

☐ Original ☒ Amendment Number: **5**

Contract Number  
**EP-W-11-044**

Contract Period

☒ Base ☐ Option Period Number:

Title of Work Assignment

**CCDS Pollutant Reduction  
Methodology Development**

Contractor

**Eastern Research Group**

Specify Section and Paragraph of Contract SOW

**Task Area VII – Planning, Measurement, Program  
Management and Analysis Support**

Purpose:

☐ Work Assignment Initiation

☐ Work Assignment Close-Out

☒ Work Assignment Amendment

☐ Incremental Funding

☒ Work Assignment Approval

Periods of Performance

From: **09/19/11**

To: **06/05/13**

Comments:

**The purpose of this amendment is to approve the workplan and cost estimate dated November 29, 2012.**

☐ Superfund

### Accounting and Appropriations Data

☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

### Authorized Work Assignment Ceiling

Contract Period:	Cost/Fee	LOE
Previously Approved	<b>\$94,825.00</b>	<b>1,089</b>
This Action	<b>\$19,500.00</b>	<b>0</b>
Total	<b>\$114,325.00</b>	<b>1,089</b>

### Work Plan / Cost Estimate Approvals

Contractor WP Dated: **11/29/12** Cost/Fee: **\$108,314/6,011** LOE: **1089**

Cumulative Approved: Cost/Fee: LOE:

Work Assignment Manager Name

**Donna Inman**

Branch/Mail Code **2221A**

Phone Number **202-564-2511**

Fax Number

(Signature)

(Date)

Project Officer Name

**Willie Griffin**

Branch/Mail Code **2221A**

Phone Number **202-564-2077**

Fax Number

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

Fax Number

(Signature)

(Date)

Contracting Officer Name

**Cara Lynch**

Branch/Mail Code **3803R**

Phone Number **202-564-4734**

Fax Number

(Signature)

(Date)

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date

United States Environmental Protection Agency  
Washington, DC 20460

Work Assignment Number

WA-04

## Work Assignment

☐ Original ☒ Amendment Number: 4Contract Number  
EP-W-11-044

Contract Period

☒ Base Option Period Number:

Title of Work Assignment

CCDS Pollutant Reduction  
Methodology Development

Contractor

Eastern Research Group

Specify Section and Paragraph of Contract SOW

Task Area VII – Planning, Measurement, Program  
Management and Analysis Support

Purpose:

☐ Work Assignment Initiation☐ Work Assignment Close-Out☒ Work Assignment Amendment☐ Incremental Funding☐ Work Assignment Approval

Periods of Performance

From: 09/19/11

To: 06/05/13

Comments:

The purpose of this amendment is to add 184 hours of effort to this Work Assignment to support on-going work under this Work Assignment.

☐ Superfund

## Accounting and Appropriations Data

☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

## Authorized Work Assignment Ceiling

Contract Period:

Cost/Fee

LOE

Previously Approved

\$94,825.00

905

This Action

\$0.00

184

Total

\$94,825.00

1089

## Work Plan / Cost Estimate Approvals

Contractor WP Dated: June 18, 2012

Cost/Fee: \$89,830/4,995.00

LOE: 905

Cumulative Approved:

Cost/Fee:

LOE:

Work Assignment Manager Name

Donna Inman

Branch/Mail Code 2221A

Phone Number 202-564-2511

Fax Number

(Signature)

(Date)

Project Officer Name

Willie Griffin

Branch/Mail Code 2221A

Phone Number 202-564-2077

Fax Number

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

Fax Number

(Signature)

(Date)

Contracting Officer Name

Cara Lynch

Branch/Mail Code 3803R

Phone Number 202-564-4734

Fax Number

(Signature)

(Date)

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date



United States Environmental Protection Agency  
Washington, DC 20460

## Work Assignment

Work Assignment Number

**WA-04**

☐ Original ☒ Amendment Number: **3**

Contract Number  
**EP-W-11-044**

Contract Period

☒ Base Option Period Number:

Title of Work Assignment

**CCDS Pollutant Reduction Methodology Development**

Contractor

**Eastern Research Group**

Specify Section and Paragraph of Contract SOW

**Task Area VII – Planning, Measurement, Program Management and Analysis Support**

Purpose:

☐ Work Assignment Initiation

☐ Work Assignment Close-Out

☒ Work Assignment Amendment

☐ Incremental Funding

☒ Work Assignment Approval

Periods of Performance

From: **09/19/11**

To: **06/05/13**

Comments:

The purpose of this amendment is to approve the contractor's work plan and cost estimate dated June 18, 2012 and to extend the period of performance through 6/5/13.

☐ Superfund

### Accounting and Appropriations Data

☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

### Authorized Work Assignment Ceiling

Contract Period:	Cost/Fee	LOE
Previously Approved	<b>\$70,900.0</b>	<b>905</b>
This Action	<b>\$23,925.00</b>	<b>0</b>
Total	<b>\$94,825.00</b>	<b>905</b>

### Work Plan / Cost Estimate Approvals

Contractor WP Dated: June 18, 2012 Cost/Fee: \$89,830/4.995 LOE: **905**

Cumulative Approved: Cost/Fee: \$89,830/\$4.995 LOE: 905

Work Assignment Manager Name

**Donna Inman**

Branch/Mail Code **2221A**

Phone Number **202-564-2511**

Fax Number

(Signature)

(Date)

Project Officer Name

**Willie Griffin**

Branch/Mail Code **2221A**

Phone Number **202-564-2077**

Fax Number

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

Fax Number

(Signature)

(Date)

Contracting Officer Name

**Cara Lynch**

Branch/Mail Code **3803R**

Phone Number **202-564-4734**

Fax Number

(Signature)

(Date)

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date



United States Environmental Protection Agency  
Washington, DC 20460

## Work Assignment

Work Assignment Number

**WA-4**

☐ Original ☒ Amendment Number: **2**

Contract Number  
**EP-W-11-044**

Contract Period

☒ Base Option Period Number:

Title of Work Assignment  
**CCDS Pollutant Reduction Methodology Development**

Contractor  
**Eastern Research Group**

Specify Section and Paragraph of Contract SOW  
**Task Area VII – Planning, Measurement, Program Management and Analysis Support**

Purpose: ☐ Work Assignment Initiation ☐ Work Assignment Close-Out  
☒ Work Assignment Amendment ☐ Incremental Funding  
☐ Work Assignment Approval

Periods of Performance

From: **09/19/11** To: **09/30/12**

Comments:

**The purpose of this amendment is to add 218 hours in effort to this Work Assignment to support on-going work under this WA Statement of Work.**

☐ Superfund

### Accounting and Appropriations Data

☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

### Authorized Work Assignment Ceiling

Contract Period:	Cost/Fee	LOE
Previously Approved	<b>\$70,900.00</b>	<b>687</b>
This Action	<b>\$0.00</b>	<b>218</b>
Total	<b>\$70,900.00</b>	<b>905</b>

### Work Plan / Cost Estimate Approvals

Contractor WP Dated: **October 13 2011** Cost/Fee: **\$67,108/3,792.00** LOE: **687**

Cumulative Approved: Cost/Fee: **\$67,108/3,792.00** LOE: **687**

Work Assignment Manager Name  
**Donna Inman**

Branch/Mail Code **2221A**

Phone Number **202-564-2511**

Fax Number

(Signature) (Date)

Project Officer Name  
**Willie Griffin**

Branch/Mail Code **2221A**

Phone Number **202-564-2077**

Fax Number

(Signature) (Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

Fax Number

Contracting Officer Name

**Cara Lynch**

Branch/Mail Code **3803R**

Phone Number **202-564-4734**

Fax Number

(Signature) (Date)

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date





United States Environmental Protection Agency  
Washington, DC 20460

## Work Assignment

Work Assignment Number

**WA-4**

☐ Original ☒ Amendment Number: **1**

Contract Number  
**EP-W-11-044**

Contract Period

☒ Base ☐ Option Period Number:

Title of Work Assignment

**CCDS Pollutant Reduction Methodology Development**

Contractor

**Eastern Research Group**

Specify Section and Paragraph of Contract SOW

**Task Area VII – Planning, Measurement, Program Management and Analysis Support**

Purpose:

- ☐ Work Assignment Initiation  
☒ Work Assignment Amendment  
☐ Work Assignment Approval
- ☐ Work Assignment Close-Out  
☐ Incremental Funding

Periods of Performance

From: **09/19/11** To: **09/30/12**

Comments:

**The purpose of this amendment is to approve the contractor's workplan and cost estimate dated October 13, 2011. The total cost/fee ceiling has increased to \$70,900.00.**

☐ Superfund

### Accounting and Appropriations Data

☐ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

### Authorized Work Assignment Ceiling

Contract Period: **Previously Approved** Cost/Fee: **\$0.00** LOE: **687**

This Action Cost/Fee: **\$70,900.00** LOE: **0**

Total Cost/Fee: **\$70,900.00** LOE: **687**

### Work Plan / Cost Estimate Approvals

Contractor WP Dated: **October 13, 2011** Cost/Fee: **\$67,108/\$3,792.00** LOE: **687**

Cumulative Approved: Cost/Fee: **\$67,108/\$3,792.00** LOE: **687**

Work Assignment Manager Name  
**Donna Inman**

Branch/Mail Code **2221A**  
Phone Number **202-564-2511**

Fax Number

(Signature)

(Date)

Project Officer Name

**Genine McElroy**

Branch/Mail Code **2223A**  
Phone Number **202-564-4746**

Fax Number

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

Fax Number

(Signature)

(Date)

Contracting Officer Name

**Cara Lynch**

Branch/Mail Code **3803R**  
Phone Number **202-564-4734**

Fax Number

(Signature)

(Date)

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date



United States Environmental Protection Agency  
Washington, DC 20460

## Work Assignment

Work Assignment Number

**WA-04**

☐ Original ☐ Amendment Number:

Contract Number  
**EP-W-11-044**

Contract Period

☒ Base ☐ Option Period Number:

Title of Work Assignment

**CCDS Pollutant Reduction  
Methodology Development,  
Implementation and Training**

Contractor

**Eastern Research Group**

Specify Section and Paragraph of Contract SOW

Task Area VII Planning, Measurement, Program Management and Analysis Support.

Purpose: ☒ Work Assignment Initiation ☐ Work Assignment Close-Out  
☐ Work Assignment Amendment ☐ Incremental Funding  
☐ Work Assignment Approval

Periods of Performance

From: **09/19/11** To: **09/30/12**

Comments:

The purpose of this work assignment is to assist EPA with support and analysis of the CCDS effort. EPA anticipates that 687 hours of effort will be required to complete this work assignment.

☐ Superfund

### Accounting and Appropriations Data

☐ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

### Authorized Work Assignment Ceiling

Contract Period: Cost/Fee LOE  
Previously Approved \$0.00 0

This Action 687

Total \$0.00 687

### Work Plan / Cost Estimate Approvals

Contractor W/P Dated: Cost/Fee: LOE:

Cumulative Approved: Cost/Fee: LOE:

Work Assignment Manager Name

**Donna Inman**

(Signature)

(Date)

Branch/Mail Code **2222A**

Phone Number **202-564-2511**

Fax Number

Project Officer Name

**Genine McElroy**

(Signature)

(Date)

Branch/Mail Code **2221A**

Phone Number **202-564-4746**

Fax Number

Other Agency Official Name

(Signature)

(Date)

Branch/Mail Code

Phone Number

Fax Number

Contracting Officer Name

**Cara Lynch**

(Signature)

(Date)

Branch/Mail Code **3803R**

Phone Number **202-564-4734**

Fax Number

**Statement of Work**  
**EPA CONTRACT EP-W-11-044**  
Work Assignment No:4

**1. Title: CCDS Pollutant Reduction Methodology Development, Implementation and Training**

**2. Period of Performance:** Date of issuance through September 30, 2012

**3. EPA Work Assignment Manager:**

Donna Inman  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Mailcode: 2221A  
Tel: 202/564-2511 Fax: 202/564-0028

**Alternate EPA Work Assignment Manager:**

Dan Klaus  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Mailcode: 2221A  
Tel: 202/564-7757 Fax: 202/564-0028

**4. Background**

The Office of Enforcement and Compliance Assurance (OECA) of the U.S. Environmental Protection Agency (EPA) in collaboration with state environmental agencies is responsible for enforcing and ensuring compliance with the nation's environmental laws. EPA believes that an effective federal enforcement and compliance assurance program is an indispensable element of the national environmental protection system. The Agency has reaffirmed this view by declaring "a credible deterrent to pollution and greater compliance with the law" as one of its overall goals pursuant to the Government Performance and Results Act (GPRA).

OECA's National Performance Measures Strategy requires annual reporting of performance measures to better characterize awareness and behavioral changes of regulated entities regarding environmental laws, and the environmental outcomes resulting from federal administrative and civil judicial enforcement cases. EPA uses the Case Conclusion Data Sheet (CCDS) to collect information on a range of environmental outcomes such as industrial process changes, reductions in air emissions, removal of hazardous wastes, and environmental restoration activities. The data are used:

- To report OECA's accomplishments under the Government Planning and Results Act (GPRA);
- As a management tool to assess regional case performance; and,
- To describe the results of our enforcement program to the public, Congress, and others.

EPA's emphasis on the environmental benefits of its compliance and enforcement activities is growing, as is its need to assess the impact of improvements from these actions. The value of the

CCDS information largely depends on its accuracy and completeness. In response to CCDS data quality concerns, OECA is in the process of updating existing guidance which establishes standard methodologies for calculating pollutant reductions from enforcement cases. OECA's Assistant Administrator recently announced the adoption of three goals that support the Administrator's priorities of improving air quality, taking action on climate change, assuring the safety of chemicals, cleaning up our communities, protecting America's waters, expanding the conversation on environmentalism and working for environmental justice, and building strong state and tribal partnerships: OECA's goals are to:

- Aggressively go after pollution problems that matter to communities;
- Reset our relationship with states;
- Improve transparency.

Improved precision in quantitative pollutant reduction reporting and the resulting qualitative environmental benefits are an essential aspect of OECA's transparency goal, which is to make meaningful facility compliance information available and accessible to the public. The work assignment will provide contractor support to the Environmental Outcome Reporting Management Committee (EORMC) for performance measurement reporting and analysis through the development of pollutant reduction calculation methodologies, step-by-step written guidance materials and excel calculator tools, and "Big Case" review and analysis of reported quantitative environmental benefits.

## **5. Purpose and Objective**

The purpose of this work assignment is to provide support and analysis to EPA through completion of this project. The support activities are as follows:

Complete Work Plan (Task 1)

Research and analyze the applicability of new methods/approaches for calculating environmental pollutant reduction benefits (Task 2)

Update existing and develop new pollutant calculation methodologies to support updated Environmental Outcome Reporting (EOR) structure (Task 3)

Modify existing and develop new excel-based calculator tools/features incorporating Task 3 updates (Task 4)

Provide support for review and analysis of quantitative environmental benefits calculations for FY11 and FY12 enforcement cases (Task 5)

Provide support in identifying FY11 and FY12 enforcement cases involving GHG emissions impacts (Task 6)

Develop training module for the updated CCDS Environmental Outcome Reporting (EOR) Guidance (Task 7)



Support delivery of Webinar training incorporating Task 7 training module materials (Task 8)

## **6. Scope of Work**

### **Task 1 - Work Plan and Budget**

Within 25 calendar days of receipt of this work assignment, the contractor shall deliver a management work plan, including a proposed level of effort, budget, and schedules of all tasks. The output of this task is the work plan. The work plan shall include at least the following: a list of tasks and description of the methods for performing each task; schedule; estimated direct labor hours by task and labor level; budget with costs broken down by line item; and names, hours, and project roles of level 2, 3, and 4 staff, and a quality assurance plan (QA Plan). The QA Plan shall be employed to ensure decisions are based on data of known and documented quality. The secondary data used for this project may be collected from various sources in the literature. The quality assurance plan will indicate the process used for obtaining and comparing the various sources of information. For data collected from outside sources as a fait accompli, e.g., the results of an industry-sponsored study, the plan will identify a standard process to assess how the data were collected, and outline the manner and extent to which secondary data will be verified. The project staff will continue to employ professional judgement to ensure that all secondary data meet the needs of the project. The plan shall also address internal quality control procedures to ensure work assignment deliverables (memoranda, technical and engineering reports, etc) address the needs set forth in the work assignment and are concisely written and accurate. The monthly progress reports for this WA shall include the estimated cumulative hours and dollars incurred through the end of the reporting period, including unbilled hours and dollars. The contractor shall notify the EPA Contract Officer, Project Officer, and EPA WAM when 75% of the work plan hours or costs have been incurred, including unbilled costs.

#### *Deliverable*

Management Work Plan  
Format: 1 electronic MS-word file

#### *Due Date*

Within 25 calendar days of receipt of  
the work assignment

### **Task 2 - Research and analyze the applicability of new methods/approaches for calculating environmental pollutant reduction benefits**

The contractor shall research available sources of information via industry and other federal/state governmental websites to identify rulemaking, policy and established scientific methods for estimating reductions in pollutant loadings to air, land, and water for the industry categories identified by the EPA WAM. The materials shall be reviewed to determine applicability of the methodology for use in characterizing environmental benefits of EPA's national compliance and enforcement program. Approximately 5 technical findings/recommendations may be required.

#### *Deliverable*

Technical Findings and Recommendations  
Format: 1 electronic MS-word file and/or excel  
spreadsheet, if applicable

#### *Due Date*

Within 4 business days after receipt of  
written technical direction from the  
EPA WAM

Task 3 - Update existing and develop new pollutant calculation methodologies to support updated Environmental Outcome Reporting (EOR) structure

The contractor shall revise existing and/or develop new methodologies for various industry and process specific case scenarios using the existing CCDS training booklet and Fact Sheet formats. The methods for calculating the benefits will be developed based on the enforcement action remedy (e.g., what activities the respondent must implement as a result of the enforcement action), rather than the statutory authority by which the enforcement action is being taken. The three categories for which benefits are reported are: 1) Removal and Restoration, 2) Reduction of Ongoing Releases, and 3) Prevention of Future Releases. The contractor shall develop and/or modify a combined total of twenty five (25) air, water, and land media case examples for the reporting categories above. The examples shall be used to describe typical complying actions when an enforcement case is settled and the detailed methodology (rules, formulae, algorithms, etc.) for quantifying resulting pollutant reduction benefits. The WAM shall identify the case scenarios to be developed and the reporting category to which each case belongs.

*Deliverable*

Pollutant Reduction Calculation Methodologies

Format: 1 electronic MS-word file and/or excel spreadsheet, if applicable

CCDS Guidance Training Booklet/Facts Sheets

Format: 1 electronic MS-word file and/or excel spreadsheet, if applicable

*Due Date*

1<sup>st</sup> round: within 8 business days after receipt of written technical direction from the EPA WAM

2<sup>nd</sup> round: within 4 business days after receipt of comments from the EPA WAM

Final: within 2 business days after EPA WAM product acceptance

1<sup>st</sup> round: within 8 business days after receipt of written technical direction from the EPA WAM

2<sup>nd</sup> round: within 4 business days after receipt of comments from the EPA WAM

Final: within 2 business days after EPA WAM product acceptance

Task 4 - Modify existing and develop new excel-based calculator tools/features incorporating Task 3 updates

The contractor shall develop excel-based calculator tools consistent with the spreadsheet format currently in use or being proposed for a select number of industry methodologies per direction of the EPA WAM. Changes to existing tools may include revisions to pollutant/constituent drop down menus, changes in pollutant concentration defaults and baseline values, and changes to computation formulae. The contractor shall quality assess each tool using test data to ensure controls are in place to prevent inaccurate entries and blank data fields. The tools shall be developed in a web compatible format to facilitate posting on OECA's National Initiatives website. A total of eight (8) new tools and five (5) existing tool revisions for various program areas may be required, including but not limited to the mineral extraction priority, greenhouse

gas reporting, mobile source emissions, Combined Sewer Overflow (CSO)/ Separate Sewer Overflow (SSO) overflows, Municipal Separate Storm Sewer Systems (MS4s), and Concentrated Animal Feeding Operation (CAFO) poultry litter.

*Deliverable*

*Due Date*

Pollutant Reduction Calculator Tools  
Format: 1 excel spreadsheet and  
MS-word file, if applicable

1<sup>st</sup> round: within 8 business days  
after receipt of written technical  
direction from the EPA WAM  
2<sup>nd</sup> round: within 4 business days  
after receipt of comments from the  
EPA WAM  
Final: within 2 business days after  
EPA WAM product acceptance

Task 5 - Provide support for review and analysis of quantitative environmental benefits calculations for FY11 and FY12 Enforcement Cases

EPA Regions and HQ enforcement case contacts are required to provide the calculations/ methodologies used for deriving pollutant reduction estimates from OECA's "Big Case" List. The contractor shall assist HQ staff with reviewing these pollutant reduction/environmental benefit calculations to ensure that the approved methodologies were applied. If it appears an inappropriate calculation or methodology was used, the contractor shall assist in drafting a response to the appropriate case contact. In addition, the contractor shall provide support to HQ staff in responding to technical questions from case contacts. Approximately 30 cases may require technical review for the reporting period.

*Deliverable*

*Due Date*

Case Review Findings & Recommendations  
Format: 1 electronic MS-word file and/or excel  
spreadsheet, if applicable

within 2 business days after receipt  
of environmental benefits  
calculation(s)

Task 6 - Provide support in identifying FY11 and FY12 enforcement cases involving GHG emissions impacts

The contractor shall support the EPA WAM in deciding which concluded enforcement cases are candidates for GHG emissions impact reporting. For purposes of limiting the cases selected, the task shall be limited to identify cases that are will achieve Scope 1 and/or Scope 2 (if applicable) intentional GHG emission reductions, either through injunctive relief addressing violations of a regulated GHG, or a SEP intended to achieve GHG emission reductions such as an energy efficiency upgrade. The potential list of cases and supporting information shall be provided by the EPA WAM.

*Deliverable*

*Due Date*

Enforcement Case Listing

within 2 business days after receipt

Format: 1 electronic MS-word file and/or excel spreadsheet, if applicable

of potential case list and supporting information

Task 7- Develop training module for the updated CCDS Environmental Outcome Reporting Guidance

The contractor shall develop training materials to describe step-by-step instructions for enforcement staff to understand and utilize the CCDS guidance and tools for properly estimating pollutant reductions and environmental benefits of enforcement cases. The training materials must address CCDS data reporting requirements and limitations as they relate to the Integrated Compliance Information System (ICIS) reporting requirements as well as Quality Assurance (QA)/Quality Control (QC) guidelines to maintain integrity of the data.

The information required to be prepared by the contractor includes:

- a PowerPoint presentation for each chapter of the CCDS guidance document
- detailed processes and methodologies showing rules, formulae, algorithms, etc. for estimating pollutant reductions and environmental benefits
- reference tables of common pollutant names and standard unit(s) of measure, QA/QC guidelines, and ICIS data entry instructions

The contractor shall compile the aforementioned information in electronic format compatible for Webinar training, as well as prepare a hard-copy training booklet to supplement the Webinar training, the number of pages of which shall not exceed the limitations of the printing clause. The contractor is required to research booklet design options and provide a recommended approach to EPA for decision prior to completion of the draft deliverable.

*Deliverable*

*Due Date*

Training Booklet Design Options

1<sup>st</sup> round: within 10 business days after receipt of written technical direction from the EPA WAM  
 2<sup>nd</sup> round: within 5 business days after receipt of comments from the EPA WAM  
 Final: within 3 business days after EPA WAM product acceptance

PowerPoint Training Materials & Training Booklet (MS-word)

1<sup>st</sup> round: within 10 business days after receipt of written technical direction from the EPA WAM  
 2<sup>nd</sup> round: within 5 business days after receipt of comments from the EPA WAM  
 Final: within 3 business days after EPA WAM product acceptance

**Task 8- Support delivery of Webinar training incorporating Task 7 training module materials**

The contractor shall make available one essential staff person to assist the EPA in delivery of the training. It is anticipated there will be four (4) webinar events lasting one and one-half days in duration each (Day 1: am session = 3 hrs, pm session = 2 hrs; Day 2 = 3 hrs) over a consecutive 2 month period to be identified by the WAM. The EPA WAM shall coordinate all room reservations, ensure appropriate room set-up and computer access, and keep an attendance log for each session. The contractor shall discuss and demonstrate to attendees designated sections of the training materials and instructions, and answer questions posed by attendees as directed by the EPA WAM.

*Deliverable*

*Due Date*

Webinar audio file

Final: 5 business days after the webinar event

**7. Contract SOW Reference**

See attached OC SOW Task Area VII, Planning, Measurement, Program Management and Analysis Support.

**8. Anticipated Travel Requirements**

There are no anticipated travel requirements under this work assignment.

**9. Additional Requirements**

Office direct costs (ODCs) for copying, postage/courier, supplies, computer usage, and graphics are allowed. No other ODCs are allowable as a direct charge to this delivery order without the prior written approval of the Contracting Officer.

Upon issuance of written technical direction, the Contractor shall submit for inspection of all work in progress at any time under this work assignment. The Contractor shall develop and maintain files supporting each task.

The contractor shall contact the Contracting Officer (CO) and/or the Project Officer (PO) by telephone to discuss any problems that may adversely affect the work on this Work Assignment. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CO and the PO.

**10. Contractor Identification**

To avoid any perception that contractor personnel are EPA employees, the contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites.

**11. Control Requirements**

1. Quality Assurance (QA) Project Plan:



This Quality Assurance (QA) Project Plan describes how the Office of Enforcement and Compliance Assurance (OECA) will comply with EPA's quality system requirements set forth in EPA Order 5360.1. The purpose of the QA Plan is to provide a blueprint for planning, implementing, and assessing the quality system for the programs administered by the Office of Compliance.

It is the policy of OECA that QA activities shall be conducted to assure environmental data generated, processed or used for its program requirements will be of known quality, and will achieve prescribed data quality objectives. Furthermore, the data will be adequate and sufficient for their intended use.

For each Statement of Work that generates or analyzes compliance/ enforcement data, the contractor shall include:

- a description of how the compliance/enforcement data will be generated by the contractor
- a requirement that the contractor prepare a QA Plan
- for data from EPA databases this should include the report, documentation of select logic, and pull/refresh dates
- for data from other sources (e.g., Websites, publications) appropriate source information shall also be maintained.

The contractor is responsible for preparing a QA Project Plan in accordance with the guidance document EPA Requirements for Quality Assurance Project Plans; EPA QAIG-5, December 2002.

2A. Organizational Conflict of Interest:

The Contractor shall warrant that, to the best of the Contractor's knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest, as defined in FAR Subpart 9.5, or that the contractor has disclosed all such relevant information. See contract clause 1552.209-71 Organization of Conflict of Interest.

2B. Notification of Conflicts of Interest Regarding Personnel:

The Contractor shall immediately notify the Project Officer and the Contracting Officer of (1) any actual or potential personal conflict of interest with regard to any of its employees working on or having access to information regarding this contract, or (2) any such conflicts concerning subcontractor employees or consultants working on or having access to information regarding the contract, when such conflicts have been reported to the Contractor. A personal conflict of interest is defined as a relationship of an employee, subcontractor employee, or consultant with an entity that may impair the objectivity of the employee, subcontractor employee, or consultant in performing the contract work. See Section H.4, contract clause EPAAR 1552.209-73 Notification of Conflict of Interest.

3. Facility Inspections Credentials:

Contractor employees who conduct lead inspections on behalf of the Environmental Protection Agency (EPA) under this SOW must complete the following EPA Training Program requirements as specified in Item 4 of Executive Order 3500.1. These are the: a) Basic Inspector Training; b) Occupational Health and Safety Training; and c) Program Specific Training. Authorization letter will be issued to the Contractor staff by the WAM Program Office Director. The Contractor shall present the authorization letter at the time of the facility or site inspection with their proper identification as the EPA contractor of this contract. See section H.31 "Inspector Training Requirements"

4. Enforcement Sensitive Information:

The contractor recognizes that contractor employees in performing tasks specified by this WA may have access to data/information, either provided by the government or first generated during contract performance, of enforcement sensitive nature which should not be released to the public without Environmental Protection Agency (EPA) approval. Enforcement sensitive refers to records or information compiled for law enforcement purposes (whether administrative, civil or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all contractor personnel, including but not limited to, subcontractor and consultant personnel assigned to work on this contract and/or WA, or with access to materials developed pursuant to such efforts, understand that this information is confidential and any disclosure or misuse of the information may result in prosecution to the fullest extent of the law. All contractor personnel are expected to exercise due diligence in safeguarding, handling or disposing of any such information.

5. Project Employee Confidentiality Agreement

The contractor agrees that the contractor employee will not disclose, either in whole or in part, to any entity external to the EPA, the Department of Justice, or the contractor, any information or data ( as defined in FAR Section 27.401) provided by the government or first generated by the contractor under this contract, any site-specific cost information, or any enforcement strategy without first obtaining the written permission of the EPA Project Officer. If a contractor, through an employee or otherwise, is subpoenaed to testify or produce documents, which could result in such disclosure, the contractor must provide immediate advance notification to the EPA so that the EPA can take action to prevent such disclosure. Such agreements shall be effective for the life and for a period of five (5) years after completion of the contract.

6. Handling of Confidential Business Information (CBI)

Contractor's access to TSCA CBI must comply with the procedures set forth in the TSCA CBI Security Manual. Likewise, access to FIFRA CBI shall follow the security procedures set forth in the FIFRA Information Security Manual.

To the extent that the work under this contract requires access to proprietary or confidential business or financial data of other companies, and as long as such data remains proprietary or confidential, the contractor shall protect such data from unauthorized use and disclosure.

All files or other information identified as Confidential Business Information (CBI) shall be treated as confidential and kept in a secure area with access limited to only contractor personnel directly involved in the case or special project assignment. The contractor, subcontractor, and consultant personnel are bound by the requirements and sanctions contained in their contracts with the EPA and in EPA's confidentiality regulations found at 40 CFR Part 2, Subpart B. The contractor subcontractors, and consultant must adhere to EPA-approved security plans which describes procedures to protect CBI, and are required to sign non-disclosure agreements before gaining access to CBI.

All official data, findings, and results of investigations and studies completed by the contractor shall be available for EPA and DOJ internal use only. The contractor shall not release any part of such data without the written direction of the WAM.